

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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THE CLEMENTINE COMPANY LLC, d/b/a THE THEATER
CENTER, WEST END ARTISTS COMPANY d/b/a THE
ACTORS TEMPLE THEATRE, SOHO PLAYHOUSE, INC.,
d/b/a SOHO PLAYHOUSE INC. d/b/a SOHO PLAYHOUSE,
CARAL LTD. d/b/a BROADWAY COMEDY CLUB,

**DECLARATION OF AIMEE
KARA LULICH**

Plaintiffs,

21-CV-7779 (CM)

-against-

BILL de BLASIO, in his official capacity as Mayor of New York
City,

Defendant.
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AIMEE KARA LULICH, declares pursuant to 28 U.S.C. § 1746, under penalty
of perjury, that the following is true and correct:

1. I am an Assistant Corporation Counsel in the office of Georgia M. Pestana, Corporation Counsel of the City of New York, attorney for Defendant Mayor Bill de Blasio. As such, I am familiar with the facts stated below and submit this declaration to place on the record the relevant documents in response to the plaintiffs' motion for a preliminary injunction, in which plaintiffs seek to enjoin the enforcement of the "Key to NYC Vaccine Mandate against Plaintiffs... and similarly situated theaters and comedy clubs in New York City."

2. Attached as Exhibit A is a true and correct copy of New York City Emergency Executive Order No. 250.¹

3. Attached as Exhibit B is a true and correct copy of New York City Executive Order No. 225.

¹ This Executive Order, and all other New York City Executive Orders, are publicly available at: <https://www1.nyc.gov/office-of-the-mayor/news.page> (last visited Oct. 8, 2021.)

4. Attached as Exhibit C is a true and correct copy of a tweet from the Soho Playhouse Twitter account stating that patrons are required to show proof of vaccination “at least 14 days in advanced [sic]”.²

Attached as Exhibit D is a true and correct copy of the Actors Temple Congregation Ezrath Israel letter to members dated July 22, 2021, stating that only fully vaccinated individuals may attend in-person services.³

Dated: New York, New York
October 8, 2021

/s
Aimee Kara Lulich
Assistant Corporation Counsel

² Also available at: <https://twitter.com/sohoplayhouse/status/1439416913826746369?s=21> (last visited Oct. 6, 2021)

³ Also available at: <https://drive.google.com/file/d/1EFRVcTL03PK7TTzsv4YTwVfEs43Z-YxM/view> (last visited Oct. 8, 2021)